

ENVIRONMENTAL SERVICES, INC.

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RALEIGH, NORTH CAROLINA 27610
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www.environmentalservicesinc.com

March 28, 2012

Mr. George Adams
NCDENR – Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, NC 28117

RE Site Cleanup Questionnaire
Merchants Metals, Inc.
165 Fanjoy Road
Statesville, Iredell County, North Carolina
ESI Project ER10-125.04


Dear Mr. Adams:

Environmental Services, Inc., (ESI) on behalf of Merchants Metals, Inc. is please to submit the Site Cleanup Questionnaire for the referenced property. The Site Cleanup Questionnaire was requested by the NCDENR in a letter dated February 24, 2012.

If you have any questions or comments, please contact me at (919) 212-1760.

Sincerely,

ENVIRONMENTAL SERVICES, INC.



Michael J. Burns, P.G.
VP, Senior Manager
Site Assessment and Remediation

ER10-125.04

Enclosure

Site Cleanup Questionnaire

Remediating parties interested in volunteering should prepare this form with the assistance of an environmental consultant. All cooperative parties are eligible for Branch-approved remedial actions. Answer all questions, based on current information, and provide written descriptions where needed.

NC DENR Site Name, City and County Merchants Metals, Inc. (MMI Products, Inc.), Statesville, Iredell County

1. Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations? ☒ Y ☐ N
If yes, please explain on a separate page.
2. What is the distance (from site property line) to the nearest residence, school or day-care center? Please attach a map showing the site and nearest residence, school or daycare center. 600 feet
3. Is the site completely surrounded by a locked fence? ☐ Y ☒ N
If no, please explain security measures at the site on a separate page.
4. Are site surface soils known to be contaminated? ☐ Y ☒ N
If yes, or unknown, describe briefly on a separate page.
5. Is site groundwater known to be contaminated? ☒ Y ☐ N
If yes, or unknown, describe briefly on a separate page.
6. Is site sediment or surface water known to be contaminated? ☒ Y ☐ N
If yes, or unknown, describe briefly on a separate page.
7. Has groundwater contamination affected any drinking water wells? ☐ Y ☒ N
If yes, or unknown, please explain on a separate page.
8. What is the distance to the nearest downgradient drinking water well? 600 feet
9. What is the distance to the nearest downstream surface water intake? >20 miles
10. Are hazardous vapors, air emissions or contaminated dust migrating into occupied residential, commercial or industrial areas? ☐ Y ☒ N
If yes, or unknown, please explain on a separate page.
11. Have hazardous substances known to have migrated off property at concentrations in excess of Branch unrestricted-use remediation goals? ☒ Y ☐ N
If yes, or unknown, please explain on a separate page.
12. Has the local community expressed concerns about contamination at the site? ☐ Y ☒ N
If yes, or unknown, please explain on a separate page.
13. Based on current information, are there any sensitive environments located on the property (sensitive environments are identified in the Remedial Investigation Work Plans section of the IHSB "Guidelines for Assessment and Cleanup" at <http://portal.ncdenr.org/web/wm/sf/sfavailabledocs>)? ☐ Y ☒ N
If yes, or unknown, please explain on a separate page.

14. Based on current information, has contamination from the site migrated into any sensitive environments? ☐ Y ☒ N

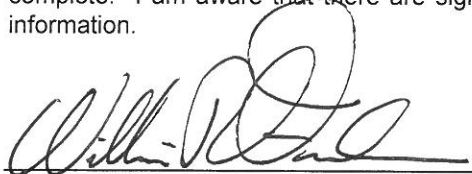
If yes, or unknown, please explain on a separate page.

15. Do site contaminants include radioactive or mixed radioactive and chemical wastes? ☐ Y ☒ N

If yes, or unknown, please explain on a separate page.

Remediating Party Certification Statement

After first being duly sworn or affirmed, I, William R Friedemann, hereby state that: I am over the age of eighteen, I am competent to make this certification based upon my own personal knowledge and belief, and, to the best of my knowledge and belief, after thorough investigation, the information contained herein is accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.



(Signature of Remediating Party Representative)

3/27/2012

(Date)

William R Friedemann Safety Env Director
(Printed Name and Title of Remediating Party Representative)

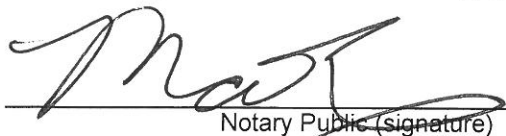
Merchants Metals, Inc.
(Printed Name of Company)

STATE OF Texas

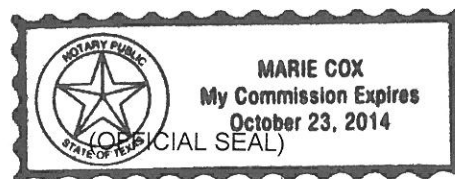
COUNTY OF Montgomery

I, Marie Cox, a Notary Public of said County and State, do hereby certify that William R. Friedemann personally appeared before me this day, produced proper identification in the form of Drivers License, was duly sworn and/or affirmed, and declared that he or she is the owner of the property referenced above or is a duly authorized agent of said owner and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is accurate and complete, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal the 27 day of March, 2012.



Notary Public (signature)



My commission expires October 23, 2014

Environmental Consultant Certification Statement

After first being duly sworn or affirmed, I, Michael Burns, hereby state that: I am over the age of eighteen, I am competent to make this certification based upon my own personal knowledge and belief, and, to the best of my knowledge and belief, after thorough investigation, the information contained herein is accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

Michael Burns
(Signature)

3/28/12
(Date)

Michael Burns
(Printed Name)

Environmental Services, Inc.
(Printed Name of Environmental Consultant)

STATE OF North Carolina

COUNTY OF Wake

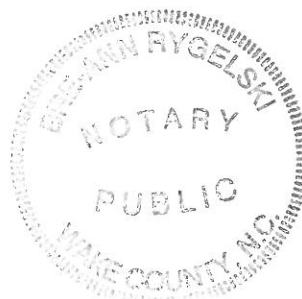
I, Bre-Ann Rygelski, a Notary Public of said County and State, do hereby certify that Michael Burns personally appeared before me this day, produced proper identification in the form of Personally Known to me, was duly sworn and/or affirmed, and declared that he or she is an environmental consultant for the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is accurate and complete, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal the 28 day of March, 2012

Bre-Ann Rygelski
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 5-26-2016



Site Cleanup Questionnaire – Additional Pages

1. Adjacency to Residential Property, School, or Day Care

Based on field observations of the site vicinity, there is a vacant residential property located adjacent to the north. The residential property has reportedly been vacant for several years and the structures are depilated. There are no schools or day care facilities adjacent to the site.

2. Distance to Nearest Residential Property, School, or Day Care

The nearest occupied residential property is located about 600 feet to the northwest at 450 Twin Oaks Road. There is a structure located about 400 feet to the north at 235 Fanjoy Road that is used as a business (**Attachment A**). The nearest school is located 2,800 feet to the southeast (Wayside School). There are no day care centers listed in the area of the site.

3. Security Measures

Based on observations during our site visits, the site has a fence with locking gates along Fanjoy Road to prevent access to the facility manufacturing and storage areas. Access to the stream that crosses the site to the west is limited due to the presence of a fence and heavily forested areas. The property to the west is a large landfill; to the south is a manufacturing facility; to the east is Fanjoy Road; and to the north is a vacant residential/forested property.

4. Contamination of Site Surface Soils

Based on previous subsurface assessments completed for the site, there is no known surface soil contamination. Zinc, cadmium and chromium impacted soils have been detected beneath the concrete slab of the former galvanizing building. There does not appear to be a threat of direct contact with contaminated surface soils by site occupants.

5. Site Groundwater Contamination

A groundwater assessment was completed at the site in June 2011. Three (3) groundwater monitoring wells (MW-1, MW-2 and MW-3) were installed to depths of 50 feet to 55 feet below the ground surface (bgs). The depth to groundwater in the monitoring wells was about 38 feet bgs. Groundwater samples collected from the monitoring wells indicated a zinc concentration at monitoring well MW-1 at a concentration of 4,390 micrograms per liter (ug/L) and an estimated

cadmium concentration of 2.6 ug/L (J-flag) which exceeded the NC 2L groundwater standard of 1,000 ug/L and 2 ug/L, respectively.

6. Site Sediment or Surface Water Contamination

A stream is located in the western portion of the property where surface water and sediment samples were collected in June 2011. Based on the surface water sampling, upstream (413 ug/L) and downstream (152 ug/L) samples indicated concentrations of zinc above the NC 2B fresh water quality standard of 50 ug/L. Upstream sediment samples indicated a zinc concentration of 1,430 milligrams per kilogram (mg/Kg) which exceeded both the sediment screening value and effects value of 124 mg/Kg.

7. Contaminated Drinking Water Wells

Based on a telephone message from Mr. Steve Hedrick with the Iredell County Health Department, there are no records of contaminated drinking water wells in the vicinity of the property. In addition, there was no information in previous reports to suggest these conditions exist in the area of the property.

8. Distance to Nearest Down-gradient Drinking Water Well

A receptor survey was conducted on January 24, and February 3, 2011 for the area within 1,500 feet of the property boundary. The receptor survey consisted of a review of the property and all accessible parcels within a 1,500 foot radius from the property boundary. Each parcel was observed for the presence of a water meter and/or a visible well/well house. In addition, ESI contacted the City of Statesville Water Department, Aqua NC, Inc. and the Iredell Water Corporation to determine the availability of potable water to the area. Based on information provided, neither the Iredell Water Corporation nor Aqua NC, Inc. provides potable water service to the area within 1,500 feet of the property boundary. The City of Statesville Water Department provided ESI with a map that presented the location of water lines and water meters for parcels within a 1,500 foot radius of the property boundary.

ESI used the City of Statesville Water Department map to verify the locations of water meters and wells during our site reconnaissance. Based on the information provided by the City of Statesville Water Department, water lines are present along Salisbury Highway (US Highway 70), along Fanjoy Road and Twin Oaks Road (toward landfill). Water lines do not extend north

of the intersection of Fanjoy Road and Twin Oaks Road, so all parcels north of the intersection use private drinking water wells. Water lines do not extend to parcels located to the south of Salisbury Highway (Shiloh Road and Seven Oaks Lane). According to the map, there are 36 developed parcels within a 1,500 foot radius of the *property* boundary. Of the 36 developed parcels, 18 use private water supply wells for drinking water. There is a water supply well used for fire suppression located on the Accuma Corporation parcel to the south.

Since area drinking water supply wells are likely cased in fractured bedrock, the direction that would constitute downgradient is difficult to determine without extensive fracture trace data. The location of the nearest drinking water supply well appears to be located about 600 feet to the north at 450 Twin Oaks Road. There is an unused water supply well located on the property.

9. Distance to Nearest Down-Stream Surface Water Intake

Based on information provided by the City of Statesville Water Department, the City gets its water from the South Yadkin River and Lookout Shoals Lake. The City of Statesville does not obtain potable water from deep wells. Based on review of the Iredell County and Davie County Environmental Sensitivity Maps 2010 obtained from the North Carolina Division of Water Quality, there were no mapped down-stream surface water intakes within 20 miles of the property.

10. Hazardous Vapors, Air Emissions, and Contaminated Dust

Since the contaminants detected at the site are metals, hazardous vapors and air emissions are not considered to be a concern for the site and surrounding area. The soil contaminants are located under a concrete slab and asphalt paving. There may be a slight risk of contaminated dust migration associated with impacted stream sediments, but only during extreme drought conditions. However, the area around the stream is heavily forested which would help mitigate the quantity and distance that dust would migrate to the surrounding area.

11. Migration of Hazardous Substances off Site

ESI collected a surface water sample from the stream where it exits the property to the north in June 2011. The downstream surface water sample indicated a zinc concentration that exceeded the NC 2B fresh surface water quality standard.

12. Local Community Concern

According to Mr. Steve Hedrick of the Iredell County Health Department, there are no records of community concerns related to the property.

13. Sensitive Environments On or Adjacent to the Site

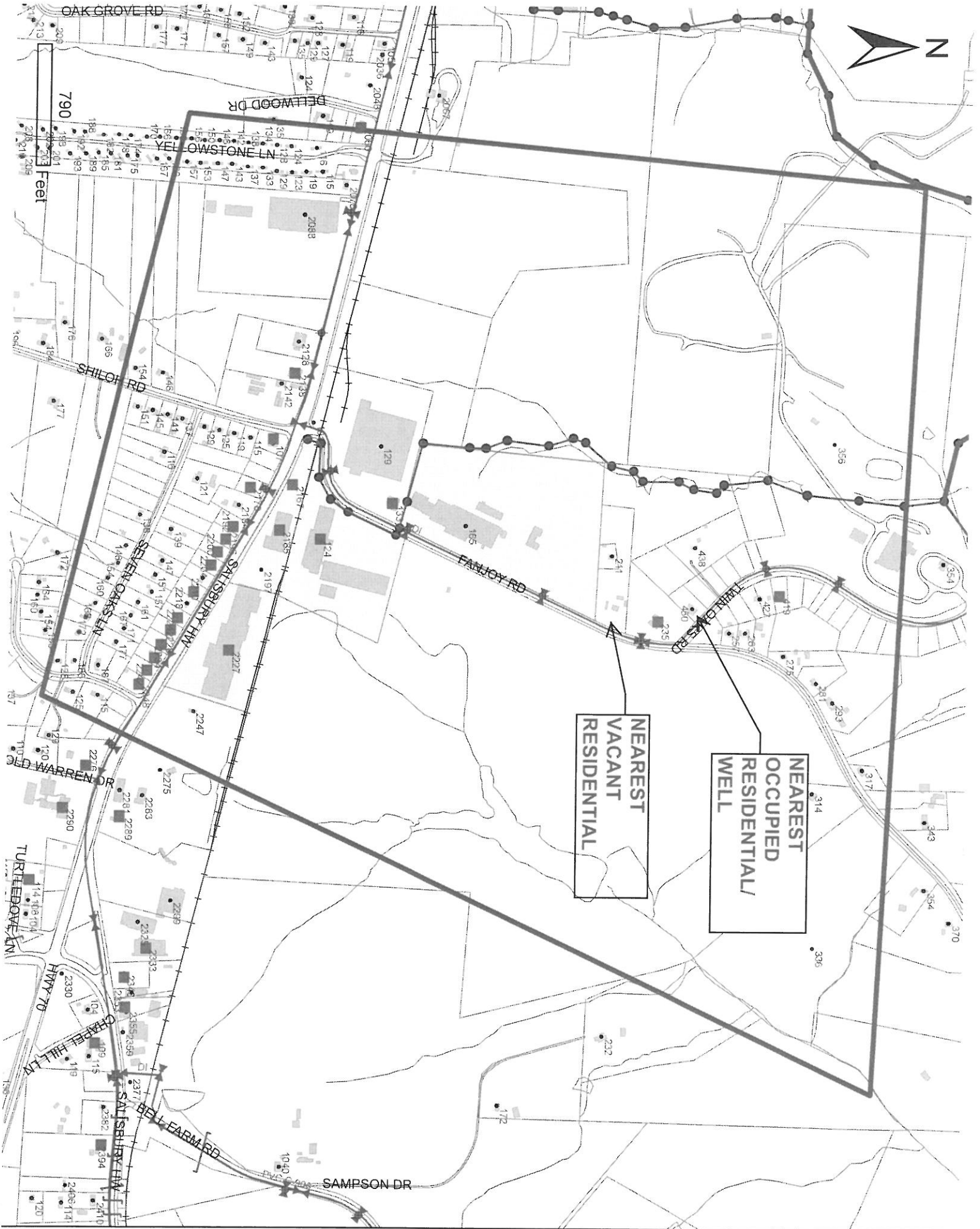
ESI reviewed information included on the NC Division of Parks and Recreation (www.ncparks.gov), The National Park Service (www.nps.gov), and the US Forest Service (www.fs.fed.us) websites as well as the North Carolina Natural Heritage Program (gis.esinc.cc/ncnhp) information. Based on the information reviewed, there are no state parks, areas important to the maintenance of unique natural areas; sensitive areas identified under the National Estuary Program, designated state natural areas, national or state seashore, Lakeshore and River Recreational Areas, rare species (state and federal threaten and endangered), sensitive aquatic habitats, national parks or monuments, federal designated Wild and Scenic Rivers, designated and proposed Federal Wilderness and Natural Areas, national preserves and forests, or federal land designated for the protection of natural ecosystems on or in the vicinity of the property.

14. Migration of Contamination into Sensitive Environments

There is no available information to suggest that there are environmentally sensitive areas on or adjacent to the site. As such, it does not appear that the contaminants have migrated to environmentally sensitive areas.

15. Radioactive Wastes

Based on review of information regarding the Merchants Metals operations, there is no information that would indicate site contaminants include radioactive or mixed radioactive and chemical wastes.



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